

FILED

08 FEB -6 PM 3:12

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY: *[Signature]* DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

08 CR 0307 JM

UNITED STATES OF AMERICA,)	Criminal Case No.
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	Title 8, U.S.C.,
)	Sec. 1324(a)(2)(B)(ii) -
MICHAEL BESS-AMARILLAS (1),)	Bringing in Illegal Aliens for
ERIK MEDELLIN-LOPEZ (2),)	Financial Gain; Title 8, U.S.C.,
ALFREDO GARCIA-ORTEGA (3),)	Secs. 1324(a)(1)(A)(ii) and
)	(v)(II) - Transportation of
Defendants.)	Illegal Aliens and Aiding and
)	Abetting; Title 8, U.S.C.,
)	Sec. 1324(a)(1)(A)(i) - Bringing
)	in Illegal Aliens; Title 18,
)	U.S.C., Sec. 2 - Aiding and
)	Abetting

The grand jury charges:

Count 1

On or about January 26, 2008, within the Southern District of California, defendants ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jesus Tovar-Venegas, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

PLS:fer:Imperial
2/6/08

Count 2

On or about January 26, 2008, within the Southern District of California, defendants ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jesus Tovar-Venegas, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 3

On or about January 26, 2008, within the Southern District of California, defendants ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, did bring or attempt to bring to the United States an alien, namely, Jesus Tovar-Venegas, knowing that said person was an alien, at a place other than a designated port of entry and at a place other than as designated by the Department of Homeland Security; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i), and Title 18, United States Code, Section 2.

Count 4

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Vanessa Mavel Martinez, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of

1 commercial advantage and private financial gain; in violation of
2 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
3 United States Code, Section 2.

4 Count 5

5 On or about January 26, 2008, within the Southern District of
6 California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and
7 ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws
8 of the United States, knowing and in reckless disregard of the fact
9 that an alien, namely, Vanessa Mavel Martinez, had come to, entered
10 and remained in the United States in violation of law, did transport
11 and move said alien within the United States in furtherance of such
12 violation of law; in violation of Title 8, United States Code,
13 Sections 1324(a)(1)(A)(ii) and (v)(II).

14 Count 6

15 On or about January 26, 2008, within the Southern District of
16 California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and
17 ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws
18 of the United States, did bring or attempt to bring to the United
19 States an alien, namely, Vanessa Mavel Martinez, knowing that said
20 person was an alien, at a place other than a designated port of entry
21 and at a place other than as designated by the Department of Homeland
22 Security; in violation of Title 8, United States Code,
23 Section 1324(a)(1)(A)(i), and Title 18, United States Code, Section 2.

24 //

25 //

26 //

27 //

28 //

Count 7

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Oscar Armando Gonzalez-Lorencana, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 8

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Oscar Armando Gonzalez-Lorencana, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

//

//

//

//

//

//

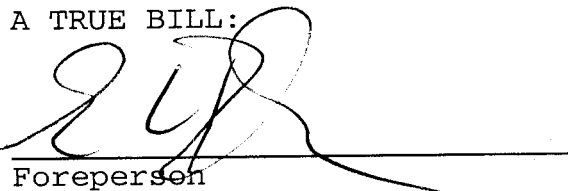
//

Count 9

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, did bring or attempt to bring to the United States an alien, namely, Oscar Armando Gonzalez-Lorenzana, knowing that said person was an alien, at a place other than a designated port of entry and at a place other than as designated by the Department of Homeland Security; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i), and Title 18, United States Code, Section 2.

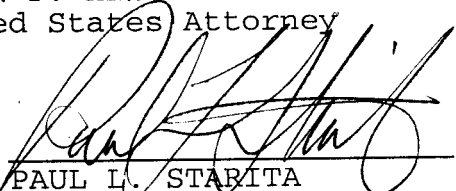
DATED: February 6, 2008.

A TRUE BILL:


Foreperson

KAREN P. HEWITT
United States Attorney

By:


PAUL L. STARITA
Assistant U.S. Attorney